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December 7, 2017

Hon. Claire R. Kelly  
United States Court of International Trade  
One Federal Plaza  
New York New York 10278-0001

Re: Claude N. Lewis v. American Sugar Refining, Inc., et al.  
Case No. 14-cv-02302 (CRK)

Dear Judge Kelly:

This office is co-counsel for Plaintiff in the above matter. This case is scheduled for a jury trial to begin on March 12, 2018, with certain deadlines leading up to the trial.

I write to request that this trial and its pre-trial deadlines be adjourned approximately one month. Defendants have graciously consented to this request and we collectively propose that the new start date for the trial be April 16, 2018, and that all pre-trial deadlines be extended by four weeks. Of course assuming the Court's availability, all deadlines would therefore be as follows.

January 22, 2018:	All submissions required by ECF Docket No. 108 (trial exhibits, responses to exhibit objections, deposition testimony and copies of deposition transcripts);
February 12, 2018:	Motions in limine due;
February 26, 2018:	Responses to motions in limine due;
March 12, 2018:	Pretrial Conference; and
April 16, 2018:	Trial.

The reason for this request is because your undersigned (as well as co-counsel Megan Goddard) are scheduled to start a jury trial in another matter (that happens to be against the same defendants (14-cv-0079)) in the SDNY on February 26, 2018, only two weeks before the currently-scheduled start date for the trial in this matter. In addition, Ms. Goddard is scheduled to start a jury trial in an unrelated matter in the SDNY (15-cv-06824) on January 26, 2018. Finally, I am scheduled to be out of Country leading a delegation of high school students on a ten-day Rotary Club service trip to Nicaragua starting February 9, 2018.

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While I was aware of the above tight schedule at the time I conferred with Defendants' counsel and we set a proposed trial date of March 12, 2018, upon reflection and consideration with my co-counsel and client it is determined that I was way too ambitious. This schedule does not provide counsel and the parties sufficient time to prepare the case for trial, hence this request is being made.

I apologize for the necessity of this request and the inconvenience it may cause the Court and its staff and very much appreciate the Court's consideration.

Respectfully submitted:

/s/ Nathaniel K. Charny

cc: All Counsel (by ECF)

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Cla R Kelly  
12/8/17